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The Honorable Thomas S. Zilly
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

TINYBUILD LLC, a Washington limited
liability company,

Plaintiff,

v.

NIVAL INTERNATIONAL LIMITED, a
Cypriot corporation, and SERGEY
ORLOVSKIY,

Defendant.

NO. 19-CV-00805-TSZ

**DECLARATION OF DIANA SIRI
BREAUX IN SUPPORT OF
TINYBUILD LLC'S MOTION TO
AMEND COMPLAINT**

I, Diana Siri Breaux, declare:

1. I am counsel of record for the Plaintiff, tinyBuild, LLC, in the above-referenced
matter, am over 18 years of age, competent to testify, and make this statement upon personal
knowledge.

2. Attached as Exhibit 1 is an English translation of a document NIVAL produced in
discovery with the designation NIVAL001557. This document was produced by NIVAL on
January 22, 2020. The document was produced in Russian. tinyBuild subsequently had the
document translated into English by a professional translator.

3. Attached as Exhibit 2 is an English translation of a document NIVAL produced in
discovery with the designation NIVAL001569. This document was produced by NIVAL on

DECLARATION OF DIANA SIRI BREAUX IN SUPPORT
OF TINYBUILD LLC'S MOTION TO AMEND
COMPLAINT - 1
CASE NO. 19-CV-00805-TSZ

SUMMIT LAW GROUP, PLLC
315 FIFTH AVENUE SOUTH, SUITE 1000
SEATTLE, WASHINGTON 98104-2682
Telephone: (206) 676-7000
Fax: (206) 676-7001

1 January 22, 2020. The document was produced in Russian. tinyBuild subsequently had the
2 document translated into English by a professional translator

3 4. Attached as Exhibit 3 is an English translation of a document NIVAL produced in
4 discovery with the designation NIVAL001560. This document was produced by NIVAL on
5 January 22, 2020. The document was produced in Russian. tinyBuild subsequently had the
6 document translated into English by a professional translator

7 DATED this 2nd day of March, 2020.

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9 By 
Diana Siri Breaux, WSBA #46112

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DECLARATION OF DIANA SIRI BREAUX IN SUPPORT
OF TINYBUILD LLC'S MOTION TO AMEND
COMPLAINT - 2
CASE NO. 19-CV-00805-TSZ

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EXHIBIT 1

FILED UNDER SEAL

EXHIBIT 2

FILED UNDER SEAL

EXHIBIT 3

FILED UNDER SEAL